

Lila Ayers
Attorney at Law
8 East Prospect Avenue, Suite A1
Mount Vernon, NY 10550
(914) 699-5220

September 29, 2025

Via CM/ECF

Hon. Natasha C. Merle, U.S.D.J.
United States District Court
Eastern District of New York

Re: Singh v. Topline, et al.
25 Civ. 776 (NCM)(VMS)

Dear Judge Merle:

This is my renewed motion for an extension of time to respond to plaintiff's motion to dismiss. The motion was previously made on September 26, 2025 (Doc. 34). At the time I made the letter motion, I did not have a copy of your Honor's rules.

I am requesting an extension to respond to the motion to Friday, October 3rd. The reason for this is I was told by my doctor to rest for a few days. I am being treated for Post Concussion Syndrome. I was feeling dizzy this weekend and had an MRI of my brain and spine today. I am being treated at NYU Langone Concussion Center.

I provided this detail as I sent an email to plaintiff's counsel and said I need an adjournment to Friday due to health concerns. He said he would consent on the condition that I consent to respond to his very late discovery demands. I have refused to do so, as plaintiff first served his discovery demands on July 8, 2025, *thirty-eight days after the deadline* and, then, only after he received an email from me, to please respond to defendants' timely filed discovery demand. This issue is the subject of my letter motion of July 10th (Doc. 29) that is to be decided by Chief Magistrate Judge Vera M. Scanlon. He also said he would oppose the application for an adjournment on the ground that I said in the email I had "health concerns." Mr. Kataev said "health concerns" was too vague and he would oppose the application. Accordingly, I provided my personal medical information.

This is the first request for an adjournment for this motion, or any motion in this case.

Thank you for your consideration.

Very truly yours,

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cc: Emanuel Kataev, Esq.